IN THE UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

Keith Purvis,)
) No. 19-1005, consolidated with Case
Petitioner,) No. 19-1003
)
V.)
)
National Labor Relations Board,)
)
Respondent.)
)

PETITIONER'S STATEMENT OF ISSUES TO BE RAISED ON APPEAL

Petitioner Keith Purvis intends to raise the following issues on appeal, although he reserves the right to add others:

- (1) Did the National Labor Relations Board err, under its own rules and the Administrative Procedure Act, 5 U.S.C. § 554, in denying Petitioner's Motion to Intervene, given the case concerned the validity of the two decertification petitions he collected against union representation?
- (2) Did the National Labor Relations Board err in imposing an affirmative bargaining order in this case even though the union concealed evidence of allegedly regained majority support.
- (3) Did the National Labor Relations Board err in imposing an affirmative bargaining order in this case on the basis that the employer allegedly aided

Petitioner's second decertification effort by directing one employee to talk to the Petitioner?

Respectfully Submitted,

Filed: 02/19/2019

Date: February 19, 2019

By: /s/ Aaron B. Solem
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Filed: 02/19/2019

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Statement of Issues to be Raised on Appeal was filed via the Court's ECF system and that the following parties were either served via the Court's CM/ECF system and by U.S.

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